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6 Attorneys for Defendants,
7 COUNTY OF LOS ANGELES, WENDY GARCIA, and BILL THOMAS

8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10
11 THE ESTATE OF "CMW", a deceased
minor, SYDNEY WATKINS,
12 individually, as successor in interest to
"CMW", and LISA LEWIS

13 Plaintiffs,

14 vs.

15 COUNTY OF LOS ANGELES,
16 LASHAUNA CANDLER GRIFFIN,
WENDY GARCIA, BILL THOMAS and
17 DOES 1 THROUGH 25, INCLUSIVE,

18 Defendants.

19 Case No.: 2:24-CV-00889-DSF-MAA
Assigned to the Honorable: Dale S.
Fischer
[Courtroom 7D]

JOINT NOTICE OF SETTLEMENT

20
21 Complaint Filed: December 22, 2023
FAC Filed: May 31, 2024
SAC Filed: July 17, 2024
Trial Date: November 4, 2025

TO THE HONORABLE COURT:

22 COMES NOW Defendants County of Los Angeles, Wendy Garcia, and Bill
23 Thomas (collectively "Defendants"), and Plaintiffs the Estate of CMW, Sydney
24 Watkins, and Lisa Lewis (collectively "Plaintiffs"), and hereby submit the following
25 Joint Notice of Settlement pursuant to Court Order (Dkt. #38 and # 41).

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1 **JOINT STATUS REPORT**

2 1. WHEREAS, this action was removed to federal court on February 1,
3 2024. (Dkt. #1.)

4 2. WHEREAS, the Parties were ordered to ADR, and referred to the
5 magistrate judge assigned to this case, the Hon. Maria Audero. The ADR
6 proceeding was ordered to be completed by October 31, 2024. (Dkt. 27.)

7 3. WHEREAS, the Parties were scheduled to attend an in-person
8 settlement conference before Judge Audero on September 6, 2024. (Dkt. #37.)

9 4. WHEREAS, the Parties did attend the settlement conference, and a
10 settlement was reached pending approval from the County. At the conclusion, the
11 Parties affirmed their acceptance, confirmed their understanding that they are bound
12 by the settlement, and agreed that a long-form agreement would be circulated in the
13 coming week(s)

14 5. WHEREAS, on November 21, 2024, the long-form settlement
15 agreement was fully executed and signed by the Parties.

16 6. WHEREAS, the County represents that the approval process has
17 commenced, and it is expected that the settlement will go before the Claims Board
18 in about one year.

19
20 DATED: February 24, 2025

**LAW OFFICE OF
MICHAEL J. CURLS**

21
22 By:

23 */s/ Michael J. Curls*
24 Michael J. Curls, Esq.
25 Nichelle D. Jordan, Esq.
26 Attorneys for Plaintiffs,
27 ESTATE OF CMW, SYDNEY
28 WATKINS, and LISA LEWIS

1 DATED: February 24, 2025
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28**PETERSON BRADFORD BURKWITZ
GREGORIO BURKWITZ & SU**By: *Avi Avery Canty*

Avi Burkowitz, Esq.

Avery Canty, Esq.

Attorneys for Defendants,
COUNTY OF LOS ANGELES,
WENDY GARCIA, and BILL
THOMAS

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1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

3 I am employed in the County of Los Angeles, State of California. I am over
4 the age of 18 and not a party to the within action; my business address is 100 North
5 First Street, Suite 300, Burbank, California 91502.

6 On February 24, 2025, I served the foregoing document described as:
7 **JOINT NOTICE OF SETTLEMENT**

8 on interested parties in this action by placing a true and correct copy thereof
9 enclosed in a sealed envelope addressed as follows:

10 **SEE ATTACHED MAILING LIST**

11 **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed
12 document(s) with the Clerk of the Court by using the CM/ECF system.
Participants in this case who are registered CM/ECF users will be served by
the CM/ECF system. Participants in this case who are not registered CM/ECF
users will be served by mail or by other means permitted by the court rules.

13 **BY MAIL:** I deposited such envelope in the mail at Burbank, California.
14 The envelope was mailed with postage thereon fully prepaid. As follows: I
15 am "readily familiar" with the firm's practice of collection and processing
correspondence for mailing. Under that practice it would be deposited with
16 U.S. postal service on that same day with postage thereon fully prepaid at
Burbank, California in the ordinary course of business. I am aware that on
17 motion of the party served, service is presumed invalid if postal cancellation
date or postage meter date is more than one day after date of deposit for
mailing in affidavit.

18 **BY ELECTRONIC MAIL:** I served the enclosed via e-mail transmission to
19 each of the parties listed on the attached service list with an email address.

20 **FEDERAL:** I declare under penalty of perjury under the laws of the United
21 States of America that the foregoing is true and correct and that I am
employed in the office of a member of the bar of this Court at whose direction
the service was made.

23 Executed on February 24, 2025, in Burbank, California.

24 /s/ Maribel De Arcos

25 Maribel De Arcos

1 **SERVICE LIST**

2 **RE: The Estate of C.M.W., et al. v. County of Los Angeles, et al.**

3 **Case
4 No.:**

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11 **In Pro Se**

12 **Attorneys for Plaintiff,
The Estate of C.M.W., et al.**

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